



Equistar Chemicals, LP
8805 North Tabler Road
Morris, IL 60450

February 24, 2015

Director, Air and Radiation
U.S. EPA Region V
77 West Jackson Blvd.
Chicago, Illinois 60604-3507

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7014 0510 0000 4868 0404

Yasmine Keppner-Bauman
Illinois Environmental Protection Agency
Bureau of Air - Compliance Section (MC 40)
PO Box 19276
Springfield, Illinois 62794-9276

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7014 0510 0000 4868 0398

Martin Tippin
Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7014 0510 0000 4868 0381

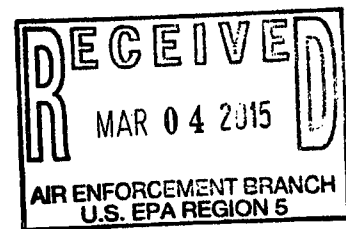
Re: 40 CFR 63 Subpart FFFF
Reporting Period July 1st through December 31st, 2014
Equistar Chemicals, LP - Morris Plant
Application No. 96010018 / I.D. No. 063800AAC

Pursuant to 40CFR§63.2520(e), Equistar Chemicals – Morris Illinois Plant - is submitting the attached Miscellaneous Organic NESHAP (MON) Periodic Report for the Polymer units. The period for this report is July 1st through December 31st, 2014.

Should you have any questions, please contact me at 815-942-7537.

Cordially,

Paul T. Syslo
Environmental Engineer



Attached: MON Periodic Report – July / December 2014



Equistar Chemicals, LP
8805 North Tabler Road
Morris, IL 60450

MON Subpart FFFF Report
Reporting Period: July 1, 2014 – December 31, 2014

40 CFR – Subpart FFFF 63.2520(e)

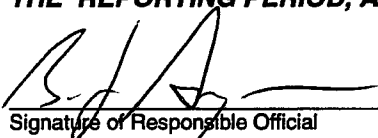
Equistar Chemicals, LP
Morris, Illinois
I.D. No.: 063800AAC
Title V Application No.: 96010018

February 24, 2015

Reporting Requirement: Company Information		
63.2520(e)(1)	Company name and address.	Equistar Chemicals, LP 8805 North Tabler Road Morris, Illinois 60450

Reporting Requirement: Statement by a Responsible Official		
63.2520(e)(2)	Statement by a responsible official with that official's name, title, and signature - Certification of the accuracy of the content of the report.	

"I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THAT THE STATEMENTS AND INFORMATION CONTAINED IN THIS DOCUMENT ACCURATELY REFLECT THE COMPLIANCE STATUS OF THIS FACILITY, FOR THE REPORTING PERIOD, AND ARE TRUE, ACCURATE, AND COMPLETE."


 Signature of Responsible Official

MIO – Plant Manager
 Title of Responsible Official

Brian J. Angwin
 Print Name of Responsible Official

2/26/2015
 Date Signed

Reporting Requirement: Reporting Period		
63.2520(e)(3)	Date of report and beginning and ending dates of the reporting period.	This is the compliance report and covers the dates from 7/1/14 to 12/31/14

Reporting Requirements: PERIODIC STARTUP, SHUTDOWN AND MALFUNCTION REPORT		
63.2520(e)(4)	Report each SSM during which excess emissions occurred during this reporting period: The semi-annual compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.	There were no Startup, Shutdowns and/or Malfunctions with excess emissions during the reporting period.

Reporting Requirements: List any Title V Deviations		
63.2520(e)(5)(i)	If there are no deviations from any emission limit, operating limit or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.	There were no deviations from the emission limits, operating limits or work practice standards during the reporting period.

63.2520(e)(5)(ii)	For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, you must include the information in paragraphs (e)(5)(ii)(A) through (C) of this section. This includes periods of SSM.	There were no deviations during the reporting period.
63.2520(e)(5)(ii)(A)	The total operating time of the affected source during the reporting period.	MCPU LDPE – 4416 hours MCPU LLDPE – 4416 hours
63.2520(e)(5)(ii)(B)	Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.	There were no deviations during the reporting period.
63.2520(e)(5)(ii)(C)	Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.	There were no deviations during the reporting period.
63.2520(e)(5)(iii)	For each deviation from an emission limit or operating limit occurring at an affected source where you are using a CMS to comply with an emission limit in this subpart, you must include the information in paragraphs (e)(5)(iii)(A) through (L) of this section.	Not applicable – not using a CMS to comply with an emission limit in this subpart.
63.2520(e)(5)(iv)	If you documented in your notification of compliance status report that an MCU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by § 63.2525(e) that exceeds an applicable HAP usage or emissions threshold.	There were no changes from Group 2 Batch Process Vent status.

Reporting Requirements: CEMS

63.2520(e)(6)	If you use a CEMS, and there were no periods during which it was out-of-control as specified in § 63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.	There were no CEMS required or in service during this reporting period.
---------------	--	---

Reporting Requirements: New Operating Scenario

63.2520(e)(7)	Include each new operating scenario	There are no new operating scenarios
---------------	-------------------------------------	--------------------------------------

	which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report.	since the last compliance report.
--	---	-----------------------------------

Reporting Requirements: Records of Process Units added

63.2520(e)(8)	Records of process units added to a PUG as specified in § 63.2525(i)(4) and records of primary product redeterminations as specified in § 63.2525(i)(5).	No process unit groups (PUG) have been created and/or added.
---------------	--	--

Reporting Requirements: Applicable Records and information for the Periodic Reports

63.2520(e)(9)	Applicable records and information for periodic reports as specified in referenced subparts F, G, H, SS, UU, WW, and GGG of this part and subpart F of 40 CFR part 65.	No requirements for this section.
Compliance with Part 63 Subparts F, G and H	Batch process vents that must comply with 63 Subparts F, G, and H, (the HON) and the MON will comply with both sets of requirements.	Batch process vents at this facility are subject only to the MON requirements, Subpart FFFF.
Compliance with Part 63 Subparts F, G and H	One heat exchanger in LDPE MCPU is subject to the monitoring and reporting requirements of 63.104.	Monitoring of the heat exchanger has been conducted quarterly. No leaks have been detected.
Compliance with Part 63 Subpart GGG and MMM	Equipment subject to Part 63 Subpart, GGG or MMM will continue to comply with Subparts GGG or MMM respectively and have no requirements for Subpart FFFF.	Not applicable at this facility by nature of chemicals produced, we do not produce pharmaceutical chemicals.
Compliance with Part 63 Subpart GGG and MMM for wastewater	Equipment subject to Part 63 Subpart GGG or MMM will continue to comply with Subparts GGG or MMM respectively and have no requirements for Subpart FFFF.	Not applicable at this facility by nature of chemicals produced, there are no wastewaters produced subject to these requirements.
Compliance with Part 63 Subpart SS	Compliance with Part 63 Subpart SS for closed vent systems routed to control devices or process or boilers and generic tank control standards	Subpart SS is applicable at this facility by routing HAP streams to the flare for control. The closed vent system monitoring and reporting have been completed. The initial compliance demonstration for the LLDPE and Polymer flares was submitted as part of the MON NOCS. All of the required reporting under Subpart SS is covered in this report.
Compliance with Part 63 Subpart WW for Standards for Storage Vessels.	One storage tank in LDPE is subject to the 63.1066 Reporting requirements.	The Propionaldehyde storage tank, an Internal Floating Roof tank, which is part of the LDPE MCPU, is subject to Subpart WW.

Compliance with Subparts UU, leak detection and repair requirements

LDAR EQUIPMENT LEAKS

<u>63.1039(b)(1) & 63.1039(b)(2)</u>	July 14	Aug 14	Sept 14	Oct 14	Nov 14	Dec 14	TOTALS
VALVES							
Leaks Detected	0	1	0	0	0	0	1
% Leaking	0.0	0.14	0.0	0.0	0.0	0.0	0.05
Total Monitored	120	727	78	65	23	826	1839
Missed repair deadlines	0	0	0	0	0	0	0
Delay of Repairs	0	0	0	0	0	0	0
PUMPS							
Leaks Detected	0	0	0	0	0	0	0
% Leaking	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Monitored	17	17	19	17	19	19	108
Missed repair deadlines	0	0	0	0	0	0	0
Delay of Repairs	0	0	0	0	0	0	0
CONNECTORS							
Leaks Detected	0	0	0	0	0	0	0
% Leaks	0	0	0	0	0	0	0
Total Monitored	0	0	0	0	0	0	0
Missed repair deadlines	0	0	0	0	0	0	0
Delay of Repairs	0	0	0	0	0	0	0
AGITATORS NO AGITATORS IN AFFECTED PROCESS UNIT ARE UNDER 40 CFR § 63.1028							
COMPRESSORS							
Leaks Detected	0	0	0	0	0	0	0
Total Monitored	0	0	0	0	0	0	0
Missed repair deadlines	0	0	0	0	0	0	0
Delay of Repairs	0	0	0	0	0	0	0
PRESSURE RELIEF DEVICES							
Leaks Detected	0	1	0	0	0	0	1
Total Monitored	4	14	2	0	0	19	39
Missed repair deadlines	0	0	0	0	0	0	0
Delay of Repairs	0	0	0	0	0	0	0

LDPE EQUIPMENT REVISIONS				
<u>63.1039(b)(8)</u>	Report any revisions to items reported in an earlier Compliance Status Report if the method of compliance has changed since the last report. The table below provides an update to the equipment type component count information that was submitted in the NOCS report.			
TYPE	ATTRIBUTE	Count (7/1/14)	Count (12/31/14)	Frequency
Valve	Accessible	985	978	Quarterly
	DTM	44	44	Annual
	Heavy Liquid	0	0	N/A
Pressure Relief Device	Vents to Atmosphere	19	19	N/A
	Vents to CVS or Process	1	1	N/A
Pump	Single Seal	14	14	Monthly
	Dual Seal	6	6	Monthly
	Canned	0	0	N/A
	Heavy Liquid	0	0	N/A
Compressor		0	0	N/A
Agitator	N/A	N/A	N/A	N/A
Sampling Connection system	Components included in valve and connector counts	0	0	N/A
Closed Vent System	Components included in valve and connector counts	0	0	N/A

Reporting Requirements: Notification of Process Change		
63.2520(e)(10)	(i) Except as specified in paragraph (e)(10)(ii) of this section, whenever you make a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, you must document the change in your compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the information in paragraphs (e)(10)(i)(A) through (C) of this section.	None
63.2520(e)(10)(i)(A)	A description of the process change.	None
63.2520(e)(10)(i)(B)	(B) Revisions to any of the information reported in the original notification of compliance status report under paragraph (d) of this section.	None
63.2520(e)(10)(i)(C)	(C) Information required by the notification of compliance status report under paragraph (d) of this section for changes involving the addition of processes or equipment at the affected source.	None